

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

GREG ADKISSON, et al.,)	
Plaintiffs,)	
v.)	No.: 3:13-CV-505-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
)	<i>Lead Case Consolidated with</i>
)	
KEVIN THOMPSON, et al.,)	
Plaintiffs,)	
v.)	No.: 3:13-CV-666-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
)	<i>as consolidated with</i>
)	
JOE CUNNINGHAM, et al.,)	
Plaintiffs,)	
v.)	No.: 3:14-CV-20-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
)	
)	
BILL ROSE,)	
Plaintiff,)	
v.)	No.: 3:15-CV-17-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
)	
)	
CRAIG WILKINSON, et al.,)	
Plaintiffs,)	
v.)	No.: 3:15-CV-274-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
)	
)	
ANGIE SHELTON, as wife and next of)	
Kin on behalf of Mike Shelton, et al.,)	
Plaintiffs,)	
v.)	No.: 3:15-CV-420-TAV-HBG
JACOBS ENGINEERING GROUP, INC., et al.,)	
Defendants.)	
)	

JOHNNY CHURCH,)	
Plaintiff,)	
v.)	No.: 3:15-CV-460-TAV-HBG
JACOBS ENGINEERING GROUP, INC., et al.,)	
Defendants.)	
_____)	
DONALD R. VANGUILDER, JR.,)	
Plaintiff,)	
v.)	No.: 3:15-CV-462-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
_____)	
JUDY IVENS, as sister and next of kin,)	
on behalf of JEAN NANCE, deceased,)	
Plaintiff,)	
v.)	No.: 3:16-CV-635-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	
_____)	
PAUL RANDY FARROW.,)	
Plaintiff,)	
v.)	No.: 3:16-CV-636-TAV-HBG
JACOBS ENGINEERING GROUP, INC.,)	
Defendant.)	

JOINT MOTION FOR EXTENSION OF TIME FOR MEDIATION

The Parties jointly move this Court for good cause to extend the deadline for mediation from June 17, 2019 (150 days from the Court's January 18, 2019 Order [Doc. 459]), until August 16, 2019. Mediation has been set by the parties for May 30-31, 2019, but the Parties and the Mediator have agreed to postpone these dates if the Court grants permission to extend the deadline.

The Parties seek this extension to provide additional time to review medical information concerning the Plaintiffs in preparation for mediation. Plaintiffs have provided the information required by the Court in its Order identifying treating physicians and claimed illnesses and

continue to supplement this information as additional medical records are obtained and reviewed. Beyond this, Plaintiffs are attempting to provide additional information requested by Defendant concerning the link between Plaintiffs' exposure to coal fly ash and their medical conditions, including physician opinions regarding specific causation, and this process is taking longer than anticipated. Defendant also needs sufficient time to review this information prior to mediation. The Court-appointed Mediator, Mr. Daniel Balhoff, supports the extension to increase the likelihood of success for the mediation.

If the Court agrees to extend the deadline for mediation, the Parties would request that the deadlines for the Mediator Report and the Parties' updates for Phase II Trial proposals be extended accordingly.

Respectfully submitted.

/s/ Gary A. Davis

Gary A. Davis, TN. Bar No. 009766
James S. Whitlock, NC Bar No. 34303
(admission Pro Hac Vice)
Davis & Whitlock, P.C.
21 Battery Park Ave., Suite 206
Asheville, NC 28801
T: (828) 622-0044
F: (828) 398-0435
gadavis@enviroattorney.com
jwhitlock@enviroattorney.com

James K. Scott
Keith D. Stewart
John Tyler Roper
Market Street Law, PLLC
625 Market Street, 14th Floor
Knoxville, TN 37902
T: (865) 437-5081
F: (866) 542-1741
jimscott264@gmail.com
keithstewart@gmail.com
tylerroperlaw@gmail.com

/s/ James F. Sanders

James F. Sanders
J. Isaac Sanders
Marie T. Scott
Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, Tennessee 37203
T: (615) 244-1713
F: (615) 726-0573
jsanders@nealharwell.com
isanders@nealharwell.com
mscott@nealharwell.com

Theodore Boutrous, Jr.
Theane Evangelis
Jeremy Smith
Gibson, Dunn & Crutcher, LLP
333 South Grand Avenue
Los Angeles, CA 90071
tboutrous@gibsondunn.com
tevangelis@gibsondunn.com
jssmith@gibsondunn.com

Attorneys for Defendant

John B. Dupree
616 W. Hill Ave, 2nd Floor
Knoxville, TN 37902
T: (865) 223-5184
john.dupree@knoxtnlaw.com

Jeffrey E. Friedman, AL Bar No. asb-6868-
n77j (admission *Pro Hac Vice*)
Friedman, Dazzio, Zulanas & Bowling, PC
3800 Corporate Woods Drive
Birmingham, AL 35242
T: (205) 278-7000
F: (205) 278-7001
jfriedman@friedman-lawyers.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 10, 2019, a copy of the foregoing was filed electronically. Notice of filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access the filing through the Court's electronic filing system.

/s/Gary A. Davis
Attorney for Plaintiffs